anc.law.ecf@alaska.gov

IN THE SUPREME COURT OF THE STATE OF ALASKA

State of Alaska, Department of Corrections, Petitioner, v. Trevor Stefano, Respondent.	)	Supreme Court No. **S-17892**

Trial Court Case No. **3AN-19-09950 CI**

AMENDED PETITION FOR REVIEW

The State of Alaska, Department of Corrections (DOC) petitions for review of a superior court order reversing DOC's decision to remove inmate Trevor Stefano from electronic monitoring and remanding to DOC to conduct a classification hearing. The superior court erroneously concluded that it had appellate jurisdiction over DOC's decision to terminate Mr. Stefano's participation in electronic monitoring. The superior court's decision is inconsistent with statutory text and contrary to this Court's precedent limiting appellate jurisdiction over DOC's administrative decisions. It also injudiciously compels DOC to allocate scarce resources to implement a new procedure with serious public safety ramifications.

Because the superior court remanded this case to DOC, appellate review is only available by petition. This Court should therefore grant review.

I. BACKGROUND

A. After Trevor Stefano violated the terms of his electronic monitoring, DOC removed him from the program and subjected him to disciplinary procedures.

Trevor Stefano is serving a 40-year sentence for murder. [Appx. 21] In 2018, he

DEPARTMENT OF LAW
OFFICE OF THE ATTORNEY GENERAL
ANCHORAGE BRANCH
1031 W. FOURTH AVENUE, SUITE 200
ANCHORAGE, ALASKA 99501
PHONE (907) 269-5100

applied for and was approved to serve the remaining years of his sentence on electronic monitoring (EM). [Appx. 21] When he began the EM program, Mr. Stefano signed a document, Electronic Monitoring Terms and Conditions, which listed conditions he was required to comply with. [Appx. 21] The Terms and Conditions required Mr. Stefano to, among other things, obtain prior approval for any visits with friends or family and to obtain permission from EM officers before having contact with a convicted felon. [Appx. 21] The Terms and Conditions explained that violating any of these terms would subject Mr. Stefano to DOC disciplinary procedures. [Appx. 21]

In July 2019, police went to Mr. Stefano's apartment in response to a report that a woman was afraid of her husband. [Appx. 23] There, police found Mr. Stefano, his wife, and his brother—who had a felony conviction in connection with the murder of a young woman. [Appx. 22, 23] Mr. Stefano's wife told the officers that Mr. Stefano had hurt her; Mr. Stefano was subsequently arrested on domestic violence charges. [Appx. 23]

Several days after Mr. Stefano's arrest, his EM officer sent him an incident report stating that he had violated the terms and conditions of EM by having unauthorized contact with his brother, and that his conduct relating to the DV arrest was inconsistent with the "expectations, directives, and Terms and Conditions of the EM program." [Appx. 23-24] The report notified Mr. Stefano that he had been terminated from the EM program. [Appx. 23-24] The report also cited Mr. Stefano for a disciplinary infraction under DOC regulation 22 AAC 05.400—"refusing to obey a direct order of a DOC staff member." [Appx. 24]

Mr. Stefano requested a classification hearing on his termination from EM; he

DEPARTMENT OF LAW
OFFICE OF THE ATTORNEY GENERAL
ANCHORAGE BRANCH
1031 W. FOURTH AVENUE, SUITE 200
ANCHORAGE, ALASKA 99501
PHONE (907) 269-5100

claimed that EM was a "rehabilitative program" and DOC could therefore not remove him from the program without notice and an opportunity to be heard. [Appx. 24] DOC denied Mr. Stefano's request for a classification hearing, stating that EM is not a rehabilitative program. [Appx. 24]

DOC did, however, schedule a hearing on Mr. Stefano's disciplinary infraction. [Appx. 24] The disciplinary tribunal found Mr. Stefano guilty of refusing to obey a direct order and sentenced him to 30 days in punitive segregation. [Appx. 25]

Mr. Stefano appealed the disciplinary decision to the superintendent of Anchorage Correctional Complex, alleging various procedural errors. [Appx. 25] He also argued that the EM Terms and Conditions do not constitute a "direct order of a DOC staff member," that he was not on notice that violation of the EM Terms and Conditions could result in discipline, and that "his rehabilitation [was] adversely affected by his return to prison." [Appx. 25-26] The superintendent affirmed the disciplinary decision, and Mr. Stefano appealed to the superior court. [Appx. 26]

B. The superior court concluded it had appellate jurisdiction over DOC's electronic monitoring decision and remanded to DOC to conduct a classification hearing.

On appeal, Mr. Stefano challenged DOC's disciplinary decision on procedural and substantive grounds. [Appx. 84] He also asserted that DOC had erroneously terminated him from EM without due process. [Appx. 123] DOC argued that because the court's jurisdiction is limited to cases where DOC's decision involves a fundamental constitutional right and arises from an adjudicative proceeding producing a record capable of review, the court lacked appellate jurisdiction over DOC's decision to terminate Mr.

DEPARTMENT OF LAW
OFFICE OF THE ATTORNEY GENERAL
ANCHORAGE BRANCH
1031 W. FOURTH AVENUE, SUITE 200
ANCHORAGE, ALASKA 99501
PHONE (907) 269-5100

Stefano from EM. [Appx. 71-72]

The court concluded that it had appellate jurisdiction over DOC's EM termination decision. [Appx. 32] With little analysis, the court concluded that the termination decision stemmed from an adjudicative process that produced a sufficient record for review. [Appx. 31-32] The court determined that EM is a rehabilitative program, that Mr. Stefano's fundamental right to rehabilitation was violated by his termination from EM, and that he was entitled to a classification hearing before DOC could terminate him from the program. [Appx. 48-53] The court vacated DOC's EM decision and remanded for DOC to conduct a classification hearing. [Appx. 52-53]

Beyond that, the court also reversed DOC's disciplinary decision, deeming the decision to charge Mr. Stefano with "refusing to obey a direct order of a DOC staff member" under 22 AAC 05.400 as arbitrary. [Appx. 44-45] In the court's view, Mr. Stefano's decision to contact his brother could have been considered "unauthorized communication or contact with the public or visitors" or "failure to follow a written rule of a facility," both of which are less serious infractions than "refusing to obey a direct order." [Appx. 43-44] The court held that the charging officer's selection of the most serious applicable infraction without explanation was arbitrary and violated Mr. Stefano's substantive due process rights. [Appx. 44-45] The court vacated DOC's disciplinary decision and remanded for further proceedings. [Appx. 45]

DOC petitioned for rehearing, reiterating that DOC's decision to terminate Mr. Stefano from EM was not appropriate for appellate review. [Appx. 16-17] DOC argued that the court's consideration of the EM decision—which the court reviewed in the

DEPARTMENT OF LAW
OFFICE OF THE ATTORNEY GENERAL
ANCHORAGE BRANCH
1031 W. FOURTH AVENUE, SUITE 200
ANCHORAGE, ALASKA 99501
PHONE (907) 269-5100

context of Mr. Stefano's disciplinary appeal—had generated confusion about the scope of the record in his disciplinary appeal and resulted in the court exceeding the scope of the remedies available in a disciplinary appeal. [Appx. 17-19] Mr. Stefano also petitioned for rehearing,[1] asking the court to revisit its rulings that DOC's EM policy was properly promulgated and that 22 AAC 05.400 applies to inmates on electronic monitoring. [Appx. 3] He also requested briefing on the constitutionality of the EM statute, AS 33.30.065. [Appx. 3] The court denied both petitions for rehearing. [Appx. 1, 14]

DOC now petitions for review of the court's determination that it had appellate jurisdiction over DOC's decision to terminate Mr. Stefano from EM.

II. QUESTION PRESENTED

Alaska Statute 22.10.020(d) limits the superior court's appellate jurisdiction over administrative appeals to cases where "appeal is provided by law." This Court recognizes appellate jurisdiction over DOC decisions only where "there is an alleged violation of fundamental constitutional rights in an adjudicative proceeding producing a record capable of review."[2] Did the superior court err in exercising appellate jurisdiction over DOC's decision to terminate Mr. Stefano from electronic monitoring?

III. REASONS FOR IMMEDIATE REVIEW

A. The Court should grant the petition for review because DOC cannot secure appellate review of this important case any other way.

The Court should grant review under Appellate Rule 402(b)(4) because this issue

---

[1] Mr. Stefano styled his filing as a motion for reconsideration, but the court treated it as a petition for rehearing. [Appx. 1, 3]

[2] *Brandon v. State, Dep't of Corr.,* 938 P.2d 1029, 1032 (Alaska 1997).

DEPARTMENT OF LAW
OFFICE OF THE ATTORNEY GENERAL
ANCHORAGE BRANCH
1031 W. FOURTH AVENUE, SUITE 200
ANCHORAGE, ALASKA 99501
PHONE (907) 269-5100

"might otherwise evade review, and an immediate decision by the appellate court is needed for guidance or is otherwise in the public interest."[3] The Court has held that when a superior court acts as an intermediate appellate court and remands a case back to an administrative agency, the superior court's decision is not a final judgment appealable as of right.[4] But once an agency takes action on remand, it will be unable to appeal its own decision.[5] This Court should grant the agency's petition here because DOC is unlikely to secure appellate review of this critical issue any other way. If this Court declines the petition, DOC will have to devote limited resources to conduct classification hearings on what amount to DOC housing decisions before it can remove even violent or dangerous inmates from EM—a public safety risk that DOC does not wish to take without clear guidance from this Court.

Appellate Rule 402(b)(2) also supports immediate review. The superior court's decision involves "an important question of law on which there is substantial ground for difference of opinion," and immediate review will materially advance the termination of the litigation. Specifically, the scope of the superior court's jurisdiction is an important

DEPARTMENT OF LAW
OFFICE OF THE ATTORNEY GENERAL
ANCHORAGE BRANCH
1031 W. FOURTH AVENUE, SUITE 200
ANCHORAGE, ALASKA 99501
PHONE (907) 269-5100

---

3 Alaska R. App. P. 402(b)(4).

4 *Dougan v. Aurora Elec. Inc*., 50 P.3d 789, 794 (Alaska 2002).

5 *See* Alaska R. App. P. 602(h) (agency in an appeal from administrative agency decision is deemed to be an appellee). Orders remanding cases to agencies in other jurisdictions carry a right of appeal. *See*, *e.g., Cliff House Nursing Home, Inc. v. Rate Setting Commission*, 390 N.E.2d 723, 724 (Mass. 1979) (commission had a right to appeal because it "cannot logically appeal from its own decision on remand," and it "may never have another opportunity to obtain judicial review…."); *see also Alsea Valley Alliance v. Dep't of Commerce*, 358 F.3d 1181, 1184 (9th Cir. 2004) (discussing collateral order doctrine).

question of law, and the jurisdictional issue presented here rests, in part, on the question of whether EM is a rehabilitative program.[6] This Court has not yet formulated a standard for what constitutes a rehabilitative program, and as such there is substantial ground for differing opinions on how to make that determination. Immediate resolution of the jurisdictional question will negate the need for DOC to conduct a contested classification hearing and possibly to defend its decision in subsequent appeals to the superintendent and the superior court. A definitive ruling from this Court would also ensure that DOC is not compelled to implement a new EM policy, which would require the reallocation of scarce agency resources.

The Court should therefore grant the petition.

IV. REASONS WHY THE DECISION IS ERRONEOUS

The superior court does not have subject matter jurisdiction to hear appeals from DOC administrative decisions.[7] Alaska Statute 22.10.020(d) limits the superior court's appellate jurisdiction over administrative appeals to cases where "appeal is provided by law," and no statute provides for appellate jurisdiction over a DOC administrative decision like the one made here. This Court also recognizes appellate jurisdiction over DOC decisions when a three-pronged test is met: (1) "there is an alleged violation of fundamental constitutional rights" (2) "in an adjudicative proceeding" (3) "producing a

DEPARTMENT OF LAW
OFFICE OF THE ATTORNEY GENERAL
ANCHORAGE BRANCH
1031 W. FOURTH AVENUE, SUITE 200
ANCHORAGE, ALASKA 99501
PHONE (907) 269-5100

[6] *See Brandon v. State, Dep't of Corr.,* 938 P.2d 1029, 1032 (Alaska 1997); *Ferguson v. State, Dep't of Corr.,* 816 P.2d 134, 139 (Alaska 1991).

[7] *Welton v. State, Dep't of Corr.*, 315 P.3d 1196, 1197 (Alaska 2014).

record capable of review."[8] None of these prongs is met in Mr. Stefano's case.

A. Mr. Stefano does not have a fundamental liberty interest in participation in electronic monitoring.

Whether to place an inmate on electronic monitoring—or remove him from it—is an administrative decision that does not implicate a fundamental liberty interest. Inmates have a liberty interest in rehabilitative programs; they cannot be terminated from those programs without some level of notice and opportunity to be heard.[9] But because EM is not a rehabilitative program, DOC's decision did not deprive Mr. Stefano of a fundamental constitutional right.

The Court has not established a definitive test for whether a program is rehabilitative. Rather, the Court's limited discussion of this issue to date has considered various factors including whether a program "is voluntary, requires application and approval, and confers special privileges,"[10] whether it ameliorates "the difficulty of making the eventual transition back to the community,"[11] and whether it "entails [a] formal training program, specified objectives, or stated rehabilitative components."[12] Justice Rabinowitz, dissenting in *Brandon v. State, Department of Corrections*, described a rehabilitative program as "a formal program addressed to the specific problems that

DEPARTMENT OF LAW
OFFICE OF THE ATTORNEY GENERAL
ANCHORAGE BRANCH
1031 W. FOURTH AVENUE, SUITE 200
ANCHORAGE, ALASKA 99501
PHONE (907) 269-5100

---

8 *Brandon,* 938 P.2d at 1032 (quoted in *Welton*, 315 P.3d at 1198).

9 *Ferguson v. State, Dep't of Corr.,* 816 P.2d 134, 139 (Alaska 1991); Alaska Const. art. I s. 12.

10 *Ferguson,* 816 P.2d at 140.

11 *Brandon*, 938 P.2d at 1032 & n.2.

12 *Moody v. State, Dep't of Corr.*, No. S-12303, 2007 WL 3197938, at *2 (Alaska Oct. 31, 2007) (unpublished).

impelled the prisoner's antisocial conduct."[13]

EM is an administrative placement determination—akin to DOC's decision to transfer an inmate from one facility to another within the state—not a rehabilitative program.[14] While inmates on EM may have access to some rehabilitative opportunities, the EM program itself does not involve a structured program of any sort, it requires no formal vocational or other training, and it does not address any specific problems underlying an inmate's antisocial conduct.[15] [Appx. 129-31] EM is instead a financial and administrative solution to overcrowding that allows the lowest-risk prisoners to serve their sentences outside of prison facilities. Indeed, the sponsor of the bill that led to the EM program explained that EM was "an attempt to provide the Department of Corrections an additional tool to help ease overcrowding and relieve some budget problems."[16] And DOC policy—which provides for notice and a hearing before being removed from a rehabilitative program[17]—does not require notice and a hearing before being terminated

DEPARTMENT OF LAW
OFFICE OF THE ATTORNEY GENERAL
ANCHORAGE BRANCH
1031 W. FOURTH AVENUE, SUITE 200
ANCHORAGE, ALASKA 99501
PHONE (907) 269-5100

---

13 *Brandon*, 938 P.2d at 1034 (Rabinowitz, J., dissenting in part).

14 *See* 1998 HB 272, H. Jud. Standing Committee minutes, Tape 98-19, Side B, at 685 (Feb 18, 1998) (testimony of Kevin Jardell, Legislative Administrative Assistant to Rep. Joe Green) (stating that the decision to place an inmate on electronic monitoring should be equated to "the department's moving somebody from the Mat-Su Pre-Trial Facility to the Cook Inlet Pre-Trial Facility").

15 *See* DOC Policy & Procedure 903.06, Community Electronic Monitoring, *available at* https://doc.alaska.gov/pnp/pdf/903.06.pdf.

16 1998 HB 272, H. Jud. Standing Committee minutes, Tape 98-19, Side B, at 595 (Feb 18, 1998) (testimony of Kevin Jardell, Legislative Administrative Assistant to Rep. Joe Green).

17 DOC Policy & Procedure 808.04, Removal from Rehabilitation and Court-Ordered Treatment Programs, *available at* https://doc.alaska.gov/pnp/pdf/808.04.pdf.

from EM.[18] Because EM is not a rehabilitative program, Mr. Stefano's removal from the program did not implicate a fundamental constitutional right, and DOC's decision is therefore not subject to the superior court's appellate jurisdiction.[19]

B. DOC's procedure for removing an inmate from electronic monitoring is not an adjudicative proceeding.

Even if EM is considered a rehabilitative program, the decision to remove an inmate from EM contains none of the hallmarks of adjudication. The "essential elements" of an adjudicative proceeding include:

> adequate notice to persons to be bound by the adjudication, the parties' rights to present and rebut evidence and argument, a formulation of issues of law and fact in terms of specific parties and specific transactions, a rule of finality specifying the point in the proceeding when presentations end and a final decision is rendered, and any other procedural elements necessary for a conclusive determination of the matter in question.[20]

None of these elements is present in DOC's decision to separate an inmate from EM. Instead, the decision is committed to the discretion of the commissioner of DOC[21] and involves only a post-termination notification to the inmate.[22]

Indeed, the court's own findings *support* the conclusion that the EM termination decision was not adjudicative. The superior court acknowledged that Mr. Stefano did not

---

18 DOC Policy & Procedure 903.06, Community Electronic Monitoring, *available at* https://doc.alaska.gov/pnp/pdf/903.06.pdf.

19 *Brandon v. State, Dep't of Corr.,* 938 P.2d 1029, 1032 (Alaska 1997).

20 *Id*.

21 AS 33.30.065(c).

22 DOC Policy & Procedure 903.06, Community Electronic Monitoring, *available at* https://doc.alaska.gov/pnp/pdf/903.06.pdf.

DEPARTMENT OF LAW
OFFICE OF THE ATTORNEY GENERAL
ANCHORAGE BRANCH
1031 W. FOURTH AVENUE, SUITE 200
ANCHORAGE, ALASKA 99501
PHONE (907) 269-5100

receive notice and an opportunity to be heard, did not have an opportunity to present testimony or evidence on the factual basis for his termination, and did not have a chance to challenge DOC's interpretation of the terms and conditions of EM. [Appx. 50-52]

C. DOC's procedure for removing an inmate from electronic monitoring does not produce a record capable of review.

The decision to remove Mr. Stefano from EM also did not produce a record capable of review. DOC's decision produced only (1) an incident report stating that Mr. Stefano had behaved inconsistently with the expectations, directives, and terms and conditions of the EM program and that he had violated the terms and conditions of EM by having unauthorized contact with his brother; (2) a Request for Interview form Stefano completed requesting a classification hearing; and (3) DOC's written denial of the request, explaining that EM is not a rehabilitative program. [Appx. 23-24] This is not a "thorough" or "detailed" record. [Appx. 32] It is a record insufficient for appellate review.

Where a DOC decision produces "only a paper record of the case," the superior court does not have appellate jurisdiction to review that decision.[23] The lack of jurisdiction is particularly evident where "there was no hearing or similar proceeding at which the parties could 'present and rebut evidence and argument,' " the parties did not have "the opportunity to examine witnesses," the process "did not involve the 'formulation of issues of law and fact,' " and "[t]here was no burden of proof to be met nor legal elements to be proven."[24] All of these factors are true for DOC's decision to

DEPARTMENT OF LAW
OFFICE OF THE ATTORNEY GENERAL
ANCHORAGE BRANCH
1031 W. FOURTH AVENUE, SUITE 200
ANCHORAGE, ALASKA 99501
PHONE (907) 269-5100

---

23 *Welton v. State, Dep't of Corr.*, 315 P.3d 1196, 1198 (Alaska 2014).

24 *Id.* (internal citations omitted).

remove Mr. Stefano from EM. By its very nature, the decision is therefore not appropriate for appellate review by the superior court.

The superior court considered the record in this case sufficient for appellate review because the court was able to review the recording of Mr. Stefano's disciplinary hearing. [Appx. 32] But that hearing was about DOC's decision to discipline Mr. Stefano under 22 AAC 05.400 for refusing to obey a direct order. The separate *administrative* decision to remove Mr. Stefano from EM had already been made before the disciplinary hearing took place, and the EM decision was not discussed or addressed in the disciplinary hearing. [Appx. 23-25, 38] The disciplinary proceedings were an entirely separate process from DOC's administrative decision to remove Mr. Stefano from EM. The record of the disciplinary hearing is thus unrelated to the EM termination decision and does not support the court's conclusion that appellate jurisdiction was appropriate.[25]

To the extent the court intended to hold that the record in an EM termination decision is sufficient for appellate review if the inmate is challenging the process employed, that holding is also erroneous. Determining the process due in a given situation requires the court to weigh the various interests at stake[26]—interests that can only be

DEPARTMENT OF LAW
OFFICE OF THE ATTORNEY GENERAL
ANCHORAGE BRANCH
1031 W. FOURTH AVENUE, SUITE 200
ANCHORAGE, ALASKA 99501
PHONE (907) 269-5100

[25] Indeed, the superior court's approach will result in similarly situated inmates being treated differently with regard to their ability to obtain judicial review of EM termination decisions. Under the superior court's rule, if an inmate is removed from EM due to DOC staffing changes, he cannot appeal DOC's administrative decision because there is no record sufficient for appellate review. But if an inmate is removed from EM because he engaged in behavior that also resulted in disciplinary proceedings, then he can "bootstrap" an EM challenge to the record of the disciplinary proceedings.

[26] *Mathews v. Eldridge*, 424 U.S. 319, 335 (1976).

evaluated after development of a factual record.[27] For example, the public safety and resource implications of requiring DOC to hold a contested hearing before it can remove someone from EM, the extent of the administrative burden on DOC if it is required to hold a classification hearing every time it removes an inmate from EM, and the particular restrictions and opportunities facing an inmate on EM and in a given correctional facility may all be relevant to the due process analysis—but all require the development of a factual record.

Additionally, carving out a novel jurisdictional exception for procedural challenges to DOC administrative or placement decisions would lead to inefficient, piecemeal litigation. In cases where an individual challenges DOC's administrative decision on both procedural and substantive grounds, courts would be forced either to issue rulings on the basis of inchoate facts, or to bifurcate the proceedings and hear the administrative appeal to decide any procedural claims, while treating merits arguments as original actions. This scenario would lead to fragmented judicial decision-making and would drain agency and judicial resources. It would also allow the *Brandon* exception to swallow the general rule that the superior court does not have appellate jurisdiction over DOC's administrative decisions in the absence of an adjudicatory proceeding producing a record sufficient for review.

DEPARTMENT OF LAW
OFFICE OF THE ATTORNEY GENERAL
ANCHORAGE BRANCH
1031 W. FOURTH AVENUE, SUITE 200
ANCHORAGE, ALASKA 99501
PHONE (907) 269-5100

[27] *Hannah v. Larche*, 363 U.S. 420, 442 (1960) (stating that due process "varies according to specific factual contexts").

D. Mr. Stefano has alternative avenues to challenge DOC's decision to remove him from electronic monitoring.

Recognizing that the superior court does not have appellate jurisdiction over DOC's EM termination decisions does not foreclose inmates from challenging those decisions altogether. This Court recognized in *Welton v. State, Department of Corrections* that although an inmate could not pursue her challenge to DOC's grievance process in an administrative appeal, she could do so in an independent action in superior court.[28] The same is true here: Mr. Stefano may bring an original action in superior court or file a petition for post-conviction relief challenging DOC's EM decision-making process.[29] Doing so will allow both parties "a full and fair hearing on these claims"[30] and will ensure that the superior court does not erroneously conflate DOC's administrative decision-making for EM with the unrelated adjudicatory process employed to address disciplinary infractions.

V. RELIEF SOUGHT

DOC respectfully requests that the Court review and reverse the portion of the superior court's decision concluding that it has appellate jurisdiction over DOC's decision to remove Mr. Stefano from the EM program.

DATED October 14, 2020.

DEPARTMENT OF LAW
OFFICE OF THE ATTORNEY GENERAL
ANCHORAGE BRANCH
1031 W. FOURTH AVENUE, SUITE 200
ANCHORAGE, ALASKA 99501
PHONE (907) 269-5100

---

[28] *Welton*, 315 P.3d at 1199.

[29] *See, e.g.*, *Ferguson v. State, Dep't of Corr.*, 816 P.2d 134, 137 (Alaska 1991) (challenge to removal from prison work program brought as civil rights action).

[30] *Welton*, 315 P.3d at 1199.

CLYDE "ED" SNIFFEN, JR.
ACTING ATTORNEY GENERAL

By: */s/Anna Jay*
Anna Jay
Assistant Attorney General
Alaska Bar No. 1711062

DEPARTMENT OF LAW
OFFICE OF THE ATTORNEY GENERAL
ANCHORAGE BRANCH
1031 W. FOURTH AVENUE, SUITE 200
ANCHORAGE, ALASKA 99501
PHONE (907) 269-5100